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April 17, 2001

The Honorable Michael K. Powell Chairman Federal Communications Commission 445 12th Street, SW Washington, DC 20554 RECEIVED
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FCC MAIL ROOM

RE: WT Docket No. 00-32

Dear Mr. Chairman:

I am writing you on behalf of Douglas County Sheriff's Office to express our concern about the FCC's intention to auction 50 MHz of spectrum in the 4940-4990 MHz (4.9 GHz) band, rather than allocating this critically needed spectrum to public safety for new broadband public safety applications.

Douglas County has been at the top of the growth charts for ten years. In an effort to manage our growth we utilize technological advances to provide services to our employees and, most importantly, to our citizens. A part of our plan is wireless high-speed data and voice systems. To accomplish this it is important to public safety to have access to spectrum in this range. Our population in the United States is being drawn to technological advances demanding radio spectrum.

Our dispatch operations serve our law enforcement services and eleven (11) fire departments in two counties. With an estimated daily population of about 400,000 persons our service plan is taxed and needs new technologies to keep up with the expected service measures.

Back in 1996, the public safety community identified the need for 95 MHz of additional spectrum to meet our communications needs over the next ten years. Of this amount, the greatest need will be for advanced wideband and broadband technologies. To date, the FCC has allocated 24 MHz to public safety users in the new 746 MHz band. There are new emerging broadband technologies and applications appearing on the horizon that will require significantly wider bandwidths.

Solutions such as personal and vehicular area networks can wirelessly integrate a variety of existing and future devices to provide a safer environment for our officers. These include image and video cameras and viewers, mobile data terminals and all their peripheral devices, palmtops, and wireless long-range headsets, microphones, earpieces and voice recognition to allow complete hands free operation. Very large data and image files can be rapidly and wirelessly transferred within Wireless Local Area Networks (WLAN), enabling images/fingerprints of wanted or missing persons, video clips of robberies, maps and layouts to be downloaded into police vehicle mobile computers as they leave the precinct. This same technology will also allow wireless uploads of videos, images and reports from the police vehicle to the command center or precinct. WLAN technology will also enable command centers to employ full motion video for remote controlled robotics in terrorist and other highly dangerous operations, and monitoring of officers or suspects in officer assistance and high risk situations to allow on scene decision making and assistance based on video transmissions. This technology would allow real time transmission of video and imagery from surveillance helicopters to command centers.

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Solutions such as personal area networks (PAN) can wirelessly integrate a variety of lifesaving tools into the firefighter's suit and helmet. These include biometric and environmental sensors, 3D location, video and thermal imaging cameras, wireless microphones and earpieces, and voice recognition to allow complete hands-free and wire-free operation of all communications. High speed wireless data links transmit this vital information to fire ground command centers, allowing them to constantly monitor the location and vital signs of all firefighters and help them navigate through smoke-filled burning buildings. These technologies could provide a critical link for quickly locating disoriented or downed firefighters before fatal injuries are sustained. Very large data and image files can be rapidly and wirelessly transferred within Wireless Local Area Networks (WLAN), enabling graphics such as maps, images and building blueprints to be downloaded into fire vehicle mobile computers as they leave the firehouse. WLAN technology will also enable fire ground command centers to employ full motion video for remote controlled robotics in intense fires, hazardous material and bomb disposal, and dangerous search and rescue operations. This technology would allow real time transmission of video and imagery from aircraft to fire ground commanders.

Although unlicensed consumer oriented broadband technologies are on the horizon in the nearby 5 GHz band, public safety agencies cannot rely on unlicensed spectrum for our mission critical applications. We must have dedicated spectrum and systems that assure the safety of our personnel via immediate priority access, uninterrupted transmissions, and guaranteed coverage and reliability. The proximity of this unlicensed band to the proposed public safety 4.9 GHz allocation allows us to leverage such standards based broadband technologies and yet have the dedicated, reliable, secure and enhanced featured broadband solutions that we require for our mission critical applications.

The Douglas County Sheriff's Office urges you and the Commission to recognize our broadband spectrum needs and allocate this much needed 4.9 GHz band to the public safety community. Obtaining this spectrum is a critical step for public safety agencies such as ours to access these new advanced broadband solutions for our mission critical applications.

Donald E. Christensen

Undersheriff

Sincerely

Douglas County Sheriff's Office

Copy to: Office of the Secretary Ms. Magalie Roman Sallas 445 12th Street, SW Washington, DC 20554